



U.S. Environmental Protection Agency
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive Arlington, VA 22202

Attention:

Emily Schmid
Registration Division
Herbicide Branch

Subject: Submission of a summary of the relative volatility of dicamba tank mixes with and without VaporGrip Xtra® in the humidome for support of the 2020 registration of XtendiMax® With VaporGrip® Technology (Alternate Brand Name: M1768 Herbicide), EPA Reg. No. 264-RERN

Dear Emily Schmid,

In the report submitted to the U.S. EPA on August 7, 2020 ("Reference List of Nineteen VaporGrip Xtra® Volatility Studies," MRID No. 51226701), Bayer referred to (pp. 6-7) a forthcoming humidome study that compared dicamba air concentrations between dicamba tank mixes with and without the addition of VaporGrip Xtra. Bayer herein provides a summary of the relative volatility of dicamba tank mixes with and without VaporGrip Xtra in the humidome. Additionally, the raw data for this study can be found in an embedded Excel file on page 10. Results demonstrated that adding VaporGrip Xtra to dicamba tank mixes reduces the volatility potential of:

- XtendiMax plus a single tank mix partner regardless of product type (**>87% reduction**), such as an herbicide, insecticide, fungicide, nutritional, or DRA;
- XtendiMax in higher-order tank mixtures (**>99% reduction**), i.e., mixes with several partners, such as XtendiMax + PowerMax + Warrant + DRA; and
- other dicamba formulations (**>89% reduction**), including Engenia, Tavium, MON 119151 (XtendiMax high-load premix with PowerMax), and Diflexx.

With this submission, there are now a total of 20 volatility studies with VaporGrip Xtra that Bayer has submitted to the EPA in support of the XtendiMax registration. As previously discussed and in light of the data contained in this and past (see MRID 51226701) submissions, Bayer requests EPA mandate the addition of

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August 11, 2020

Steven T. Callen, Ph.D.

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VaporGrip Xtra (and other volatility-reducing agents) to dicamba tank mixes in the upcoming registration.

This application is being submitted electronically and contains the following documents:

- This cover letter
- Application for Pesticide Registration – EPA Form 8570-1
- Public Data Matrix (8570-35)
- Agency Data Matrix (8570-35)
- Transmittal Document
- Report: Summary of the Relative Volatility of Dicamba Tank Mixes With and Without MON 51817 in the Humidome, MRID No. **51226801**

Should you require any additional information or have any questions or concerns regarding this submission, please contact me (contact information on page 1) or George Sabbagh in our Washington D.C. office at (913) 231-6291 or george.sabbagh@bayer.com.

Sincerely,

Bayer U.S. – Crop Science

A handwritten signature in black ink, appearing to read "Steven T. Callen".

Steven T. Callen, Ph.D.
Federal Regulatory Manager